

# EXHIBIT L



Anthony Morris

14 (Pages 50 to 53)

Page 50	Page 52
<p>1 there.</p> <p>2 A. See, right now, I mean, I don't really have it</p> <p>3 all written down. I had it written down. But right now</p> <p>4 I'm actually -- I'm lost right now about what's going on,</p> <p>5 though.</p> <p>6 Q. Okay.</p> <p>7 A. I know you're questioning me, but I know you</p> <p>8 ain't questioning me for the good. And I know it's for</p> <p>9 the bad. So...</p> <p>10 Q. Do you want me to come back to that question?</p> <p>11 A. It's up to you. But I doubt I'm going to have</p> <p>12 an answer for it.</p> <p>13 Q. Okay. So you want me to just leave it?</p> <p>14 A. It's up to you.</p> <p>15 Q. Well, let's just move on.</p> <p>16 So those are the two named defendants</p> <p>17 left in the case that you have claims against.</p> <p>18 A. Right.</p> <p>19 Q. So looking outside of them, just in general,</p> <p>20 how do you think you were discriminated against?</p> <p>21 A. Number one, I thought it was a class action.</p> <p>22 I look at it as being discrimination of being a black man</p> <p>23 in Merit. That's how I look at it for them, because they</p> <p>24 was in control of what was going on. Simple as that.</p>	<p>1 Q. Who was that officer that you asked?</p> <p>2 A. Carmine. Corporal Carmine. He was a corporal</p> <p>3 back in Merit, though.</p> <p>4 Q. Do you know anything about the person who did</p> <p>5 get the job?</p> <p>6 A. Well, I know he just came back -- I know he</p> <p>7 just came from Medium Building. I can't really -- I</p> <p>8 don't really know his name, but I know they call him</p> <p>9 "Raz."</p> <p>10 Q. "Raz"?</p> <p>11 A. Yeah.</p> <p>12 Q. Do you know if he had disciplinary write-ups</p> <p>13 or what kind of inmate he was or what kind of reputation</p> <p>14 he had?</p> <p>15 A. No. Not really. I just know he just came</p> <p>16 from medium back to Merit and ended up getting the job</p> <p>17 before I did.</p> <p>18 Q. Do you think that Stan Taylor or Rick Kearney</p> <p>19 had any role in whether or not you got that job?</p> <p>20 A. I don't know.</p> <p>21 Q. Anything else? Any other reasons why you</p> <p>22 think you were discriminated against?</p> <p>23 A. Man, it's -- no. Not really offhand.</p> <p>24 Q. You told me about the most recent disciplinary</p>
Page 51	Page 53
<p>1 Q. Okay. So in your view as a class action, you</p> <p>2 just think that the black race in the prison is being</p> <p>3 discriminated against?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Is there anything that's happened to</p> <p>6 you specifically that causes you to think you've been</p> <p>7 discriminated against?</p> <p>8 A. Discriminate? Man, I've been getting</p> <p>9 discriminated. Everything they do is discrimination,</p> <p>10 man. Like when I was back there, I asked the counselor</p> <p>11 can I -- well, I asked the sergeant -- the corporal back</p> <p>12 there about this job. Nobody had the job as a tier man</p> <p>13 job. He told me, well, he had to check. Then they had</p> <p>14 this dude that just came from back there when he was back</p> <p>15 there two months. And they gave the job to a white man.</p> <p>16 And I been there for almost three years at that time. He</p> <p>17 gave that job to him who just got back there. And I've</p> <p>18 been working.</p> <p>19 Usually you go by the system. If you've</p> <p>20 been in this spot for a certain amount of time, then you</p> <p>21 owe for that spot. You don't just come and somebody move</p> <p>22 back there and you get in the spot before somebody else</p> <p>23 get back there before you. Many times I've been</p> <p>24 discriminated against.</p>	<p>1 write-up. What other write-ups have you received while</p> <p>2 incarcerated?</p> <p>3 A. That was the only write-up -- I beat one. For</p> <p>4 fighting was the only write-up I had since I've been in</p> <p>5 incarceration.</p> <p>6 Q. Okay. So the one you beat we talked about</p> <p>7 earlier. Then the fighting one recently?</p> <p>8 A. Right.</p> <p>9 Q. Okay. You haven't had any other smaller ones?</p> <p>10 A. Oh. I remember one time once in the kitchen</p> <p>11 I didn't go to work. But it was my day off, though. But</p> <p>12 somehow they ended up putting my name on -- something</p> <p>13 like that -- on my day off. And they ended up suspending</p> <p>14 me or whatever. But that was it. I went back to the job</p> <p>15 a couple weeks later.</p> <p>16 Q. Okay. You didn't lose your job for that one?</p> <p>17 A. No. Because it was my day off.</p> <p>18 Q. Was that the one you beat?</p> <p>19 A. No. This is another write-up that was like a</p> <p>20 bull crap write-up.</p> <p>21 Q. Okay.</p> <p>22 A. I didn't beat it. I just got a little warning</p> <p>23 for it. Put it like that.</p> <p>24 Q. So were they a little more lenient, I guess?</p>



Anthony Morris

16 (Pages 58 to 61)

Page 58	Page 60
<p>1 Q. Okay. So because of the presence of the</p> <p>2 guards you think that it's assumed that it's considered a</p> <p>3 bad side?</p> <p>4 A. Man, they know it's the bad side. I mean, the</p> <p>5 lieutenants and them, they don't actually come out and</p> <p>6 say it, but they might like try to joke about it and act</p> <p>7 like they be joking. But the whole time they be dead</p> <p>8 serious. Like this is the bad side and stuff like that.</p> <p>9 But it become a joke to them. But they want to think</p> <p>10 it's a joke. But the whole time it be the truth, though,</p> <p>11 what they be saying.</p> <p>12 Q. Are there any other reasons why the east side</p> <p>13 is better?</p> <p>14 A. To be honest with you -- why it's better? I</p> <p>15 guess because there's more white people over there</p> <p>16 probably.</p> <p>17 Q. Why does that make it better?</p> <p>18 A. Why does that make it better?</p> <p>19 Q. Mm-hmm.</p> <p>20 A. I'm not saying that it do makes it better.</p> <p>21 You know what I'm not saying? I'm saying -- it don't</p> <p>22 matter -- I'm not saying because -- I'm saying what they</p> <p>23 think.</p> <p>24 Q. I'm going to go back and ask.</p>	<p>1 could say no. It depends on how you want to be.</p> <p>2 Q. Do most inmates think that Merit is a better</p> <p>3 place to be housed?</p> <p>4 A. You got some people. Then you got some people</p> <p>5 rather go back to the violent way they were living before</p> <p>6 they went back there. It depends.</p> <p>7 Q. Do you think it's a better place?</p> <p>8 A. What: To be back in Merit?</p> <p>9 Q. Yes.</p> <p>10 A. The only thing really -- it's a nice better</p> <p>11 place because it's two people in a cell. You know what</p> <p>12 I'm saying?</p> <p>13 Q. Do you personally think that Merit is better?</p> <p>14 A. Oh, yeah. In a way it is and in a way it</p> <p>15 ain't. I think, because, you know, you got two people in</p> <p>16 a cell or whatever, you don't really have to be around a</p> <p>17 whole bunch of noise and this and that. So, yes, I would</p> <p>18 say it's probably better. It's supposed to be, anyway.</p> <p>19 Q. In the complaint one of the paragraphs alleged</p> <p>20 that prison officials maintain policies that deny black</p> <p>21 inmates equal protection. Do you know what policies</p> <p>22 they're referring to?</p> <p>23 A. Can you say that again?</p> <p>24 Q. In the complaint, paragraph 26 says Stanley</p>
Page 59	Page 61
<p>1 Why is the east side considered better</p> <p>2 than the west side? What other reasons?</p> <p>3 A. I don't know. I guess because you -- to be</p> <p>4 honest with you, I don't know if they claim they're --</p> <p>5 basically, really no other reason really, though, except</p> <p>6 for the simple fact that most of them are white over</p> <p>7 there than black people. Nine times out of ten, you got</p> <p>8 like people that have been down there a long time over</p> <p>9 there anyway. You got like retirement folks over there,</p> <p>10 so...</p> <p>11 Q. You have people who are in for a longer period</p> <p>12 of time --</p> <p>13 A. Yeah.</p> <p>14 Q. -- on the east side?</p> <p>15 A. Yeah.</p> <p>16 Q. Do those types of inmates have a tendency to</p> <p>17 stay out of trouble more?</p> <p>18 A. To be honest with you, not too many people get</p> <p>19 in trouble back in Merit. You know what I'm saying? So</p> <p>20 really I can't say that. Just the simple fact they</p> <p>21 separated it. They want their sides. So they try to</p> <p>22 like separate us.</p> <p>23 Q. Is Merit better housing than anywhere else?</p> <p>24 A. In a way you could say yeah. In a way you</p>	<p>1 Taylor and Warden Rick Kearney maintain policies that</p> <p>2 deny black inmates equal protection. I was asking: Do</p> <p>3 you know what policies they're referring to?</p> <p>4 A. No, I don't.</p> <p>5 Q. Okay. What damages are you specifically</p> <p>6 alleging?</p> <p>7 A. Hold on. Excuse me. My fault.</p> <p>8 Q. Yeah.</p> <p>9 A. The question you just asked me, it might be</p> <p>10 talking about how Merit East and Merit West was being</p> <p>11 separated in different people. I think that's where the</p> <p>12 equal protection rights came at.</p> <p>13 Q. Okay. Do you think there's some written</p> <p>14 policy they're referring to? I guess what I'm trying to</p> <p>15 grasp is where this idea of the policy came from.</p> <p>16 A. I not really sure about that question.</p> <p>17 Q. Okay. All right. What damages or injury are</p> <p>18 you alleging?</p> <p>19 A. Who?</p> <p>20 Q. What kind of injury are you alleging? What</p> <p>21 damages?</p> <p>22 A. Who? Me myself?</p> <p>23 Q. Yes.</p> <p>24 A. Man, I'm not really sure about that question</p>